

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	§	Chapter 11
	§	
W. R. GRACE & CO., et al.,	§	Case No. 01-01139 (JKF)
	§	
<i>Debtors.</i>	§	Jointly Administered
	§	
	§	Objection Deadline: 8/29/2011; 4:00 p.m. ET
	§	Hearing Date: 12/19/2011; 9:00 a.m. ET

**SECOND QUARTERLY APPLICATION OF R. KARL HILL,
SEITZ, VAN OGTROP & GREEN, P.A., LOCAL COUNSEL TO
THE HON. ALEXANDER M. SANDERS, JR., THE LEGAL
REPRESENTATIVE FOR FUTURE ASBESTOS-RELATED
PROPERTY DAMAGE CLAIMANTS AND HOLDERS OF DEMANDS
FOR COMPENSATION FOR SERVICES AND REIMBURSEMENT
OF EXPENSES FOR THE 41ST QUARTERLY PERIOD
FROM APRIL 1, 2011 THROUGH JUNE 30, 2011**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, R. Karl Hill, Seitz, Van Ogtrop & Green, P.A., Local Counsel to the Hon. Alexander M. Sanders, Jr., pursuant to sections 327, 330 and 331 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the Appointment Order (as defined below), the Administrative Order Under 11 U.S.C. §§105(a) and 331 Establishing Procedures for Interim Compensation and Reimbursement of Professionals and Official Committee Members (the "Interim Compensation Order"), the Amended Administrative Order under 11 U.S.C. §§105(a) and 331 Establishing Revised Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Official Committee Members (the "Amended Interim Compensation Order") and Del. Bankr. LR 2016-2, and hereby applies for an order allowing him (i) compensation in the amount of

\$9,405.00 for the reasonable and necessary services he has rendered as local counsel to the Legal Representative for Future Asbestos-Related Property Damage Claimants and Holders of Demands and (ii) reimbursement of actual and necessary expenses that he has incurred in the amount of \$40.00, for a total of \$9,445.00, or one hundred percent (100%) of all compensation and expense reimbursement requested, for the period April 1, 2011 through June 30, 2011 (the "Quarterly Fee Application"), and in support of this Quarterly Fee Application, would respectfully show as follows:

SUMMARY

Name of Applicant:	Seitz, Van Ogtrop & Green, P.A. R. Karl Hill, Esq.
Authorized to Provide Services To::	Hon. Alexander M. Sanders, Jr., Legal Representative for Future Asbestos- Related Property Damage Claimants and Holders of Demands
Date of Retention:	September 29, 2008, <i>nunc pro tunc</i>
Period for Which Compensation and Reimbursement is Sought:	April 1, 2011 through June 30, 2011
Amount of Fees Sought as Actual Reasonable and Necessary:	\$9,405.00
Amount of Expenses Sought as Actual, Reasonable and Necessary:	\$40.00

This is a(n): ☐Monthly ☒Quarterly ☐Interim ☐Final Application

PRIOR APPLICATIONS

Date Filed	Period Covered	Requested Fees ¹	Requested Expenses	Status of Fees	Status of Expenses
11-13-2009	9-29-08 to 2-28-09	\$1,632.00	\$0.00	Paid	Paid
3-25-2011	3-1-09 to 2-28-11	\$1,838.40	\$4.80	Paid	Paid
5-5-2011	3-1-2011 to 3-31-2011	\$816.00	\$0.00	Paid	Paid
6-3-2011	4-1-2011 to 4-30-2011	2,628.00	\$0.00	CNO Filed	CNO Filed
7-5-2011	5-1-2011 to 5-31-2011	\$1,464.00	\$40.00	CNO Filed	CNO Filed
8-1-2011	6-1-2011 to 6-30-2011	\$3,432.00	\$0.00	Pending	Pending

R. Karl Hill and Kevin A. Guerke are the only attorneys providing services in this Fee Application period. Mr. Hill has practiced law for over 20 years, and his billing rate is \$300.00 per hour. Mr. Guerke has practiced law for 10 years and his billing rate is \$175.00 per hour. In this Quarterly Application period, Mr. Hill billed 27.5 hours and Mr. Guerke billed 6.6 hours, for a total amount billed of \$9,405.00 of which 80% (\$7,524.00) has been paid or has payment pending, leaving the amount not yet approved or paid of \$1,881.00.

The time for preparation of this Second Quarterly Application is approximately 0.5 hours, for which \$325.00 will be requested in a future application by lead counsel for the PD FCR.

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¹ At 80% of the total incurred.

COMPENSATION BY PROJECT CATEGORY

Project Category	Hours	Amount
Confirmation	34.1	\$9,405.00
TOTAL	34.1	\$9,405.00

EXPENSE SUMMARY

Description	Expense
Courier	\$15.00
Pro hac vice fee (Alan Rich)	\$25.00
TOTAL	\$40.00

APPLICATION

1. On April 2, 2001, (the "Petition Date") each of the Debtors filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Bankruptcy Code (the "Chapter 11 Cases"). On April 2, 2001, the Court entered an order procedurally consolidating the Chapter 11 Cases for administrative purposes only. Since the Petition Date, the Debtors are continuing to operate their businesses and manage their properties and assets as debtors-in-possession pursuant to sections 1107(a) and 1108 of the United States Bankruptcy Code.

2. On May 3, 2001, the Court entered an Interim Compensation Order, as amended by the Amended Interim Compensation Order, establishing procedures for monthly compensation and reimbursement of expenses of professionals (each such application, a "Monthly Fee Application"), and whereby any notice party listed in the Amended Interim

Compensation Order may object to such Monthly Fee Application. If no notice party objects to professional's Monthly Fee Application within twenty (20) days after the date of service of the Monthly Fee Application, the applicable professional may submit to the Court a certification of no objection authorizing the interim compensation and reimbursement of eighty percent (80%) of the fees requested and one hundred percent (100%) of the expenses requested, subject to the filing and approval of the interim and final fee applications of the professional.

3. Furthermore, and also pursuant to the Amended Interim Compensation Order, within forty-five (45) days of the end of each quarter, professionals are required to file and serve, upon the notice parties, a quarterly request (a "Quarterly Fee Application") for interim Court approval and allowance of the Monthly Fee Applications filed during the quarter covered by that Quarterly Fee Application. If the Court grants the relief requested by the Quarterly Fee Application, the Debtors are authorized and directed to pay the professional 100% of the fees and expenses requested in the Monthly Fee Applications covered by that Quarterly Fee Application, less any amounts previously paid in connection with the Monthly Fee Applications. Any payment made pursuant to the Monthly Fee Applications or a Quarterly Fee Application is subject to final approval of all fees and expenses at a hearing on the professional's final fee application.

4. By an October 20, 2008 order of this Court, later made *nunc pro tunc* as of September 22, 2008, the PD FCR was appointed by the Court. By an Order of this Court, *nunc pro tunc* as of September 29, 2008, R. Karl Hill, Seitz, Van Ogtrop & Green, P.A. was retained as local Delaware counsel by the PD FCR (the "Appointment Order"). The Appointment Order authorizes the Debtors to compensate Mr. Hill and Seitz, Van Ogtrop & Green, P.A. at their

normal hourly rate charged for services of this type and to be reimbursed for actual and necessary out-of-pocket expenses incurred, subject to application to this Court in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, all applicable local rules and orders of this Court.

5. This Quarterly Fee Application, which is submitted in accordance with the Amended Interim Compensation Order, is the Second Quarterly Fee Application for compensation for services rendered by Mr. Hill and his firm in connection with the Chapter 11 Cases and covers the fee period of April 1, 2011 through June 30, 2011 (the "Fee Period").

6. The following Monthly Fee Applications for interim compensation during the Fee Period have been filed respecting Mr. Hill and his firm's services:

- (a) "Application of Seitz, Van Ogtrop & Green, P.A. for Compensation for Services and Reimbursement of Expenses as Local Counsel to the Legal Representative for Future Asbestos-related Property Damage Claimants and Holders of Demands for the Fourth Interim Period From April 1, 2011 Through April 30, 2011," seeking \$2,628.00 in fees (80% of \$3,285.00);
- (b) "Application of Seitz, Van Ogtrop & Green, P.A. for Compensation for Services and Reimbursement of Expenses as Local Counsel to the Legal Representative for Future Asbestos-related Property Damage Claimants and Holders of Demands for the Fifth Interim Period From May 1, 2011 Through May 31, 2011," seeking \$1,464.00 in fees (80% of \$1,830.00), and \$40.00 in expenses;
- (c) "Application of Seitz, Van Ogtrop & Green, P.A. for Compensation for Services and Reimbursement of Expenses as Local Counsel to the Legal Representative for Future Asbestos-related Property Damage Claimants and Holders of Demands for the Sixth Interim Period From June 1, 2011 Through June 30, 2011," seeking \$3,432.00 in fees (80% of \$4,290.00).

7. The monthly fee applications covered by this Quarterly Fee Application contain detailed daily time logs describing the actual and necessary services provided by Mr. Hill and his firm during the Fee Period, as well as other detailed information

required to be included in fee applications. The Fourth, Fifth and Sixth monthly fee applications are attached hereto as Exhibits “1,” “2” and “3.”

8. The periods for objecting to the fee and expense reimbursements relating to the Fourth and Fifth monthly fee applications have each passed without any objections being filed, whereupon Certificates of No Objection were filed with the Court. The period within which to object to the Third Application expires on August 22, 2011. Mr. Hill and his firm have not yet received interim compensation and reimbursement of 80% of the fees and 100% of the expenses requested for the Fourth and Fifth Applications, although it is assumed that payment will be received in due course.

9. One previous Quarterly Fee Applications has been filed by Mr. Hill and his firm.

10. By this Quarterly Fee Application, Mr. Hill and his firm request that the Court approve the interim allowance of compensation for professional services rendered and the reimbursement of actual and necessary expenses incurred by Mr. Hill and his firm from April 1, 2011 through June 30, 2011, and order the payment of that amount, less any amounts previously paid to Mr. Hill and his firm pursuant to the Monthly Fee Applications and the procedures set forth in the Amended Interim Compensation Order. As stated above, the full scope of the services provided and the related expenses incurred are fully described in the Monthly Fee Applications that already have been filed with the Court.

11. Mr. Hill and his firm reserve the right to seek at a later date compensation for services rendered and expenses incurred during the applicable period that are not otherwise included in the relevant monthly fee applications.

12. At all relevant times, Mr. Hill and his firm have been disinterested persons as that term is defined in Section 101(14) of the United States Bankruptcy Code, as modified by section 1107(b) of the United States Bankruptcy Code and have not represented or held an interest adverse to the interest of the Debtors.

13. All services for which compensation is requested by Mr. Hill and his firm were performed as counsel to the PD FCR and not on behalf of any committee, creditor, or other person.

14. Mr. Hill believes that this First Quarterly Fee Application complies with the requirements of Del. Bankr. LR 2016-2 and the Amended Interim Compensation Order.

15. During the Interim Period, Mr. Hill and his firm have received no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with these Chapter 11 Cases, other than the interim compensation payments pursuant to the Amended Interim Compensation Order. There is no agreement or understanding between Mr. Hill and his firm and any other person for the sharing of compensation to be received for services rendered in these cases, other than normal intra-firm distributions at Mr. Hill's law firm.

16. The professional services and related expenses for which Mr. Hill and his firm request interim allowance of compensation and reimbursement of expenses were rendered and incurred in connection with these cases in the discharge of their professional responsibilities as counsel to the PD FCR in the Chapter 11 Cases. The services of Mr. Hill and his firm have been necessary and beneficial to future property damage claimants as well as the Debtors and their estates, creditors, and other parties in interest.

17. Pursuant to Fed R. Bankr. P. 2016(b), other than normal intra-firm distributions at his law firm, Mr. Hill and his firm have not shared, nor has agreed to share: (a) any compensation it has received or may receive with another party or person, or (b) any compensation another person or party has received or may receive in connection with the Chapter 11 Cases.

WHEREFORE, R. Karl Hill and Seitz, Van Ogtrop & Green, P.A. respectfully request that the Court enter an order, providing that (a) for the period from April 1, 2011 through June 30, 2011, an administrative allowance be made to Mr. Hill and his firm in the sum of \$9,405.00 as compensation for reasonable and necessary professional services rendered as local counsel to the PD FCR, and \$40.00 in expenses, a total of \$9,445.00; (b) that the Debtors be authorized and directed to pay to Mr. Hill and his firm the outstanding amount of such sums, less any sums previously paid to Mr. Hill and his firm pursuant to the Monthly Fee Applications and the procedures set forth in the Amended Interim Compensation Order and (c) this Court grant such other and further relief to which Mr. Hill and his firm are justly entitled.

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Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'ABR' followed by a stylized flourish.

Alan B. Rich, Esq.
Texas Bar No. 16842350
4244 Renaissance Tower
1201 Elm Street
Dallas, Texas 75270
(214) 744-5100
(214) 744-5101 [fax]
arich@alanrichlaw.com

COUNSEL TO HON. ALEXANDER
M. SANDERS, JR., LEGAL
REPRESENTATIVE FOR FUTURE
ASBESTOS-RELATED PROPERTY
DAMAGE CLAIMANTS AND HOLDERS
OF DEMANDS

DECLARATION

R. Karl Hill declares as follows:

I am counsel hired by the PD FCR with the approval of the Court, and am familiar with the services rendered by me and my firm. I have reviewed the foregoing Application and the facts set forth therein are true and correct to the best of my knowledge, information and belief. I believe that this Application substantially complies with Local Bankruptcy Rules for the District of Delaware.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 9, 2011.



CERTIFICATE OF SERVICE

AUGUST

I certify that on the 9th day of ~~May~~, 2011, this document was served through the ECF system on all persons who have requested notice through the ECF system, and upon the special notice parties by electronic mail.



EXHIBIT 1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	§	Chapter 11
	§	
W. R. GRACE & CO., et al.,	§	Case No. 01-01139 (JKF)
	§	
<i>Debtors.</i>	§	Jointly Administered
	§	
	§	Objection Deadline: 6/23/11
	§	Hearing Date: TBD (if needed)

**SUMMARY OF APPLICATION OF SEITZ, VAN OGTROP & GREEN, P.A.
FOR COMPENSATION FOR SERVICES AND REIMBURSEMENT OF
EXPENSES AS LOCAL COUNSEL TO THE LEGAL REPRESENTATIVE
FOR FUTURE ASBESTOS-RELATED PROPERTY DAMAGE CLAIMANTS
AND HOLDERS OF DEMANDS FOR THE FOURTH INTERIM
PERIOD FROM APRIL 1, 2011 THROUGH APRIL 30, 2011**

Name of Applicant:	Seitz, Van Ogtrop & Green, P.A. R. Karl Hill, Esq.
Authorized to Provide Services To:	Hon. Alexander M. Sanders, Jr., Legal Representative for Future Asbestos- Related Property Damage Claimants and Holders of Demands
Date of Retention:	September 29, 2008 (<i>nunc pro tunc</i>)
Period for Which Compensation and Reimbursement is Sought:	April 1, 2011 through April 30, 2011
Amount of Fees Sought as Actual Reasonable and Necessary:	\$2,628.00 [80% of \$3,285.00]
Amount of Expenses Sought as Actual, Reasonable and Necessary:	\$0
This is a(n): <input checked="" type="checkbox"/> Monthly <input type="checkbox"/> Interim <input type="checkbox"/> Final Application	

PRIOR APPLICATIONS

Date Filed	Period Covered	Requested Fees ¹	Requested Expenses	Status of Fees	Status of Expenses
11-13-2009	9-29-08 to 2-28-09	\$1,632.00	\$0.00	Paid	Paid
3-25-2011	3-1-09 to 2-28-11	\$1,838.40	\$4.80	Paid	Paid
5-3-2011	3-1-11 to 3-31-2011	\$816.00	\$0.00	CNO Filed	CNO Filed

R. Karl Hill is the only attorney providing services in this Fee Application period. Mr. Hill has practiced law for over 20 years, and his billing rate is \$300.00 per hour. In this application period, Mr. Hill billed 10.95 hours, for a total amount billed of \$3,285.00 of which 80% is currently sought, in the amount of \$2,628.00.

As stated above, this is the Fourth application for monthly fees and expenses. The time for preparation of this Application is approximately .4 hours, for which \$260.00 will be requested in a future application by lead counsel for the PD FCR.

COMPENSATION BY PROJECT CATEGORY

Project Category	Hours	Amount
Confirmation	10.95	\$3,285.00
TOTAL	10.95	\$3,285.00

EXPENSE SUMMARY

Description	Expense
	\$0
TOTAL	\$0

Detail of the fees and expenses billed is attached hereto as Exhibit A.

¹ At 80% of the total incurred.

CERTIFICATION OF COUNSEL PURSUANT TO LOCAL RULE 2016-2(f)

I, Alan B. Rich, a professional person seeking approval of this Monthly Fee Application, and having reviewed the requirements of Local Rule 2016-2, hereby certify that in my opinion, this Monthly Fee Application complies with Local Rule 2016-2.

Respectfully Submitted,



Alan B. Rich, Esq.
Texas Bar No. 16842350
1201 Elm Street, Suite 4244
Dallas, Texas 75270
(214) 744-5100
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arich@alanrichlaw.com

COUNSEL TO HON. ALEXANDER
M. SANDERS, JR., LEGAL
REPRESENTATIVE FOR FUTURE ASBESTOS-
RELATED PROPERTY DAMAGE CLAIMANTS
AND HOLDERS OF DEMANDS

CERTIFICATE OF SERVICE

I certify that on the 3rd day of June, 2011, this document was served through the ECF system on all persons who have requested notice through the ECF system, and upon the special notice parties by electronic mail.



EXHIBIT A

SEITZ, VAN OGTROP & GREEN, P.A.
 222 Delaware Avenue, Suite 1500
 P.O. Box 68
 Wilmington, Delaware 19899
 (302) 888-0600 Fax: (302) 888-0606

Alexander M. Sanders, Jr.
 c/o Alan B. Rich, Esquire
 One Main Place, Suite 1910
 1201 Main Street, LB 201
 Dallas TX 75202-3909

Page: 1
 May 25, 2011
 Account No: 40324-001M
 Statement No: 26051

Sanders In Re: W. R. Grace

For Services Rendered Through 04/30/2011

		<u>Fees</u>	Hours	
04/04/2011	RKH	Emails with A. Rich re: filing of notice of appearance (.2); Review final and file notice of appearance and certificate of service (1.1)	1.30	
04/05/2011	RKH	Review appellate docket.	1.00	
04/06/2011	RKH	Anderson issues on appeal/designation of record (.3); Maryland Casualty issues on appeal and deposition (.3); joint designation of record filed by Debtors et al., (1.0).	1.60	
04/21/2011	RKH	Motion of bank lenders to exceed page limitation (.35); motion to seal file by Libby claimants (.20).	0.55	
04/26/2011	RKH	Various tasks associated with adding Mr. Rich to notice of recipient log (1.0); Supplemental Appendix filed by Maryland Casualty (.5); brief of BNSF Railway (.30); brief of Gov't employees (.55); brief of Lange (.5); brief of Montana (.5) brief of Anderson Memorial Hospital (.5) brief of Libby claimants (.5); brief of AXA Belgium (.5); brief of Garlock (.5); brief of unsecured creditors (.5).	6.00	
04/28/2011	RKH	Notice from Court on appellees brief due date (May 28) (.20); pro hac vice notice for Rich (.1); order regarding excess pages (.20).	0.50	
For Current Services Rendered			10.95	3,285.00

Summary of Fees

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
R. Karl Hill	10.95	\$300.00	\$3,285.00

Alexander M. Sanders, Jr.

Page: 2

May 25, 2011

Account No:

40324-001M

Statement No:

26051

Sanders In Re: W. R. Grace

Total Current Work	3,285.00
Previous Balance	\$3,729.80
Balance Due	<u>\$7,014.80</u>
Please Remit	<u>\$7,014.80</u>

Remittance is due and payable upon receipt. Thank you.

EXHIBIT 2

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	§	Chapter 11
	§	
W. R. GRACE & CO., et al.,	§	Case No. 01-01139 (JKF)
	§	
<i>Debtors.</i>	§	Jointly Administered
	§	
	§	Objection Deadline: 7/25/11
	§	Hearing Date: TBD (if needed)

**SUMMARY OF APPLICATION OF SEITZ, VAN OGTROP & GREEN, P.A.
FOR COMPENSATION FOR SERVICES AND REIMBURSEMENT OF
EXPENSES AS LOCAL COUNSEL TO THE LEGAL REPRESENTATIVE
FOR FUTURE ASBESTOS-RELATED PROPERTY DAMAGE CLAIMANTS
AND HOLDERS OF DEMANDS FOR THE FIFTH INTERIM
PERIOD FROM MAY 1, 2011 THROUGH MAY 31, 2011**

Name of Applicant:	Seitz, Van Ogtrop & Green, P.A. R. Karl Hill, Esq.
Authorized to Provide Services To:	Hon. Alexander M. Sanders, Jr., Legal Representative for Future Asbestos- Related Property Damage Claimants and Holders of Demands
Date of Retention:	September 29, 2008 (<i>nunc pro tunc</i>)
Period for Which Compensation and Reimbursement is Sought:	May 1, 2011 through May 31, 2011
Amount of Fees Sought as Actual Reasonable and Necessary:	\$1,464.00 [80% of \$1,830.00]
Amount of Expenses Sought as Actual, Reasonable and Necessary:	\$40.00
This is a(n): <input checked="" type="checkbox"/> Monthly <input type="checkbox"/> Interim <input type="checkbox"/> Final Application	

PRIOR APPLICATIONS

Date Filed	Period Covered	Requested Fees ¹	Requested Expenses	Status of Fees	Status of Expenses
11-13-2009	9-29-08 to 2-28-09	\$1,632.00	\$0.00	Paid	Paid
3-25-2011	3-1-09 to 2-28-11	\$1,838.40	\$4.80	Paid	Paid
5-3-2011	3-1-11 to 3-31-2011	\$816.00	\$0.00	Paid	Paid
6-3-2011	4-1-2011 to 4-30-2011	\$2,628.00	\$0.00	CNO Filed	CNO Filed

R. Karl Hill is the only attorney providing services in this Fee Application period. Mr. Hill has practiced law for over 20 years, and his billing rate is \$300.00 per hour. In this application period, Mr. Hill billed 6.1 hours, for a total amount billed of \$1,830.00 of which 80% is currently sought, in the amount of \$1,464.00. Mr. Hill also incurred \$40.00 in reasonable and necessary expenses, of which 100% of said amount is sought. The total sought by this Application is therefore \$1,870.00.

As stated above, this is the Fifth application for monthly fees and expenses. The time for preparation of this Application is approximately .4 hours, for which \$260.00 will be requested in a future application by lead counsel for the PD FCR.

COMPENSATION BY PROJECT CATEGORY

Project Category	Hours	Amount
Confirmation	6.1	\$1,830.00
TOTAL	6.1	\$1,830.00

¹ At 80% of the total incurred.

EXPENSE SUMMARY

Description	Expense
Courier Fee	\$15.00
Pro Hac Vice fee	\$25.00
TOTAL	\$40.00

Detail of the fees and expenses billed is attached hereto as Exhibit A.

CERTIFICATION OF COUNSEL PURSUANT TO LOCAL RULE 2016-2(f)

I, Alan B. Rich, a professional person seeking approval of this Monthly Fee Application, and having reviewed the requirements of Local Rule 2016-2, hereby certify that in my opinion, this Monthly Fee Application complies with Local Rule 2016-2.

Respectfully Submitted,



Alan B. Rich, Esq.
Texas Bar No. 16842350
1201 Elm Street, Suite 4244
Dallas, Texas 75270
(214) 744-5100
(214) 744-5101 [fax]
arich@alanrichlaw.com

COUNSEL TO HON. ALEXANDER
M. SANDERS, JR., LEGAL
REPRESENTATIVE FOR FUTURE
ASBESTOS-RELATED PROPERTY
DAMAGE CLAIMANTS AND HOLDERS
OF DEMANDS

CERTIFICATE OF SERVICE

I certify that on the 5th day of July, 2011, this document was served through the ECF system on all persons who have requested notice through the ECF system, and upon the special notice parties by electronic mail.

A handwritten signature in black ink, appearing to read "MBRIL", is positioned above a horizontal line.

EXHIBIT A

SEITZ, VAN OGTRUP & GREEN, P.A.
 222 Delaware Avenue, Suite 1500
 P.O. Box 68
 Wilmington, Delaware 19899
 (302) 888-0600 Fax: (302) 888-0606
 [REDACTED]

Alexander M. Sanders, Jr.
 c/o Alan B. Rich, Esquire
 4244 Renaissance Tower
 1201 Elm Street
 Dallas TX 75270

Page: 1
 June 28, 2011
 Account No: 40324-001M
 Statement No: 26284

Sanders In Re: W. R. Grace

For Services Rendered Through 05/31/2011

		<u>Fees</u>	Hours	
05/02/2011	RKH	Various Pro hac vice application.	0.50	
05/03/2011	RKH	Various Pro Hac Vice.	0.20	
05/09/2011	RKH	Attention to fee application.	0.65	
05/17/2011	RKH	Various Pro hac vice applications.	0.20	
05/25/2011	RKH	Attention to reviewing, signing, filing and serve appellee's brief on appeal.	1.55	
05/31/2011	RKH	Review Garlock Brief (1.5); Review Arrowood's brief (0.5); Grace's brief on lender issues (1.0)	3.00	
		For Current Services Rendered	6.10	1,830.00

Summary of Fees

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
R. Karl Hill	6.10	\$300.00	\$1,830.00

Expenses

Courier fees	15.00
Paid to U.S. District Court - State of DE Pro Hac Vice	25.00
<u>Reimbursable Costs Thru 06/28/2011</u>	40.00
Total Current Work	1,870.00

June 28, 2011

40324-001M

26284

Alexander M. Sanders, Jr.

Account No:

Statement No:

Sanders In Re: W. R. Grace

Previous Balance	\$7,014.80
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Payments

06/28/2011	Payment via EFT from Trust Account for Invoice 25629	-1,840.80
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Balance Due	<u>\$7,044.00</u>
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Your trust account #2 balance is

06/28/2011	Opening Balance	\$1,840.80
	Payment of Invoice 25629	
	PAYEE: Seitz, Van Ogtrop & Green, P.A.	-1,840.80
	Closing Balance	<u>\$0.00</u>
	Please Remit	<u>\$7,044.00</u>

Remittance is due and payable upon receipt. Thank you.

EXHIBIT 3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	§	Chapter 11
	§	
W. R. GRACE & CO., et al.,	§	Case No. 01-01139 (JKF)
	§	
<i>Debtors.</i>	§	Jointly Administered
	§	
	§	Objection Deadline: 8/22/11; 4 pm ET
	§	Hearing Date: TBD (if needed)

**SUMMARY OF APPLICATION OF SEITZ, VAN OGTROP & GREEN, P.A.
FOR COMPENSATION FOR SERVICES AND REIMBURSEMENT OF
EXPENSES AS LOCAL COUNSEL TO THE LEGAL REPRESENTATIVE
FOR FUTURE ASBESTOS-RELATED PROPERTY DAMAGE CLAIMANTS
AND HOLDERS OF DEMANDS FOR THE SIXTH INTERIM
PERIOD FROM JUNE 1, 2011 THROUGH JUNE 30, 2011**

Name of Applicant:	Seitz, Van Ogtrop & Green, P.A. R. Karl Hill, Esq.
Authorized to Provide Services To:	Hon. Alexander M. Sanders, Jr., Legal Representative for Future Asbestos- Related Property Damage Claimants and Holders of Demands
Date of Retention:	September 29, 2008 (<i>nunc pro tunc</i>)
Period for Which Compensation and Reimbursement is Sought:	June 1, 2011 through June 30, 2011
Amount of Fees Sought as Actual Reasonable and Necessary:	\$3,432.00 [80% of \$4,290.00]
Amount of Expenses Sought as Actual, Reasonable and Necessary:	\$0
This is a(n): <input checked="" type="checkbox"/> Monthly <input type="checkbox"/> Interim <input type="checkbox"/> Final Application	

PRIOR APPLICATIONS

Date Filed	Period Covered	Requested Fees ¹	Requested Expenses	Status of Fees	Status of Expenses
11-13-2009	9-29-08 to 2-28-09	\$1,632.00	\$0.00	Paid	Paid
3-25-2011	3-1-09 to 2-28-11	\$1,838.40	\$4.80	Paid	Paid
5-3-2011	3-1-11 to 3-31-2011	\$816.00	\$0.00	Paid	Paid
6-3-2011	4-1-2011 to 4-30-2011	\$2,628.00	\$0.00	CNO Filed	CNO Filed
7-5-2011	5-1-2011 to 5-31-2011	\$1,464.00	\$40.00	CNO Filed	CNO Filed

R. Karl Hill and Kevin A. Guerke are the only attorneys providing services in this Fee Application period. Mr. Hill has practiced law for over 20 years, and his billing rate is \$300.00 per hour. Mr. Guerke has practiced law for 10 years and his billing rate is \$175.00 per hour. In this application period, Mr. Hill billed 10.45 hours and Mr. Guerke billed 6.6 hours, for a total amount billed of \$4,290.00 of which 80% is currently sought, in the amount of \$3,432.00.

As stated above, this is the Sixth application for monthly fees and expenses. The time for preparation of this Application is approximately .4 hours, for which \$260.00 will be requested in a future application by lead counsel for the PD FCR.

COMPENSATION BY PROJECT CATEGORY

Project Category	Hours	Amount
Confirmation	17.05	\$4,290.00
TOTAL	17.05	\$4,290.00

¹ At 80% of the total incurred.

EXPENSE SUMMARY

Description	Expense
TOTAL	\$0

Detail of the fees and expenses billed is attached hereto as Exhibit A.

CERTIFICATION OF COUNSEL PURSUANT TO LOCAL RULE 2016-2(f)

I, Alan B. Rich, a professional person seeking approval of this Monthly Fee Application, and having reviewed the requirements of Local Rule 2016-2, hereby certify that in my opinion, this Monthly Fee Application complies with Local Rule 2016-2.

Respectfully Submitted,



Alan B. Rich, Esq.
Texas Bar No. 16842350
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Dallas, Texas 75270
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COUNSEL TO HON. ALEXANDER
M. SANDERS, JR., LEGAL
REPRESENTATIVE FOR FUTURE
ASBESTOS-RELATED PROPERTY
DAMAGE CLAIMANTS AND HOLDERS
OF DEMANDS

CERTIFICATE OF SERVICE

I certify that on the 1st day of August, 2011, this document was served through the ECF system on all persons who have requested notice through the ECF system, and upon the special notice parties by electronic mail.

A handwritten signature in black ink, appearing to read "MBRIL", is positioned above a horizontal line.

EXHIBIT A

SEITZ, VAN OGTROP & GREEN, P.A.

222 Delaware Avenue, Suite 1500

P.O. Box 68

Wilmington, Delaware 19899

(302) 888-0600 Fax: (302) 888-0606
[REDACTED]

Alexander M. Sanders, Jr.
c/o Alan B. Rich, Esquire
4244 Renaissance Tower
1201 Elm Street
Dallas TX 75270

Account No:
Statement No:

Page: 1
July 27, 2011
40324-001M
26384

Sanders In Re: W. R. Grace

For Services Rendered Through 06/30/2011

Fees

		Hours	
06/07/2011			
RKH	Emails from Rich re: pro hac vice (.1); reply email (.1); draft Pro Hac Vice Application and Certification for A. Rich (.8); File pro hac vice application and certification (.3)	1.30	
06/08/2011			
RKH	Libby Answering brief in opposition to file consolidated briefing.	0.85	
06/16/2011			
RKH	Review joint motion of Bank Lender Group and Committee's for leave to file reply [Dkt. 130] (1.0); Review Debtor's responses to Libby Objection to Consolidated briefing (0.2); Motion for leave to file reply filed by Garlock (0.65)	1.85	
	RKH	Emails re: covering oral argument on June 28	0.20
06/27/2011			
KAG	Office conference with R. Karl Hill regarding oral argument in EDPA.	0.20	
06/28/2011			
KAG	Reviewed oral argument order (.3). Reviewed brief (.5). Reviewed docket (.2). Travel to and from EDPA (1.0) (1/2 time). Attend oral argument (4.4).	6.40	
	RKH	Office conference with Kevin A. Guerke re: coverage in Philadelphia (.1); Pull oral argument notice and our brief (0.40)	0.50
06/29/2011			
RKH	Travel to Philadelphia for oral argument before Judge Buckwalter (1/2 time) (.5); attend oral argument in EDPa (4.5); travel back to Wilmington (1/2 time) (.5); email recap to Rich and clients (.25)	5.75	
		17.05	4,290.00
	For Current Services Rendered		

Alexander M. Sanders, Jr.

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July 27, 2011

Account No:

40324-001M

Statement No:

26384

Sanders In Re: W. R. Grace

Summary of Fees

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
R. Karl Hill	10.45	\$300.00	\$3,135.00
Kevin A. Guerke	6.60	175.00	1,155.00

Total Current Work	4,290.00
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Previous Balance	\$7,044.00
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Payments

07/13/2011	Payment via EFT from Trust Account of 80% of Invoice 25862	-816.00
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Balance Due	<u>\$10,518.00</u>
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Your trust account #2 balance is

07/13/2011	Opening Balance	\$816.00
	Payment of Invoice 25862 (80%)	
	PAYEE: Seitz, Van Ogtrop & Green, P.A.	-816.00
	Closing Balance	<u>\$0.00</u>

Please Remit	<u>\$10,518.00</u>
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Remittance is due and payable upon receipt. Thank you.